

# Exhibit 3

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*Attorneys for Defendant Utah Tech University*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, SOUTHERN REGION

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REBECCA BROADBENT, JARED  
RASBAND, AND HAZEL  
SAINSBURY,

*Plaintiffs,*

v.

UTAH TECH UNIVERSITY, *et al.*

*Defendants.*

**DECLARATION OF COURTNEY  
WHITE  
[SEALED]**

Case No. 4:24-cv-00091-DN

JUDGE DAVID NUFFER  
MAGISTRATE JUDGE PAUL  
KOHLER

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Utah Tech University, by and through counsel, Jaqualin F. Peterson, Darin B. Goff, and Daniel R. Widdison, Assistant Utah Attorneys General, hereby submits the following Declaration of Courtney White.

1. I, Courtney White, am a resident of St. George Utah and over 18 years of age.

2. I have a degree in law from the University of Oregon, a master's degree in public administration from the University of Utah, and a bachelor's degree from Utah State University.

3. I have been a university administrator for more than twenty years, of which, I have spent almost ten years as an administrator at Utah Tech University.

4. I am currently the Interim President of Utah Tech University, a position I have held continuously since January 2024.

5. For legal services, the University employs a full-time general counsel, two associate general counsel, and is billed directly for full-time legal support from an Assistant Utah Attorney General. The University cannot function without legal counsel.

6. As an administrator, I rely on the frank communications between myself and counsel as I seek legal advice about University operations. For those communications to be effective, I must be able to be candid with the University's attorneys, who can be candid in response. Without the protections of the attorney's duty of confidentiality, neither I, nor any other administrator, could effectively run the University.

7. I expect the University's attorneys to abide by their ethical duty of loyalty and confidentiality to their client, Utah Tech University.

8. Ms. Broadbent and Mr. Rasband are both counsel for Utah Tech University and hold themselves out as attorneys for the University, advising and consulting with University employees as part of normal business.

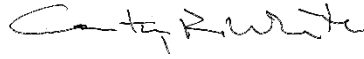
9. As Interim President of the University, I have not consented to the use of any information known by the University's attorneys in any dispute with the University outside of the University's internal resolution processes.

10. Additionally, to secure compliance with discrimination and enforcement rules, regulations, and University policies, the University employs a Director of Equity Compliance and Title IX Coordinator. The duties for this position include maintaining as confidential all matters brought to their attention, except as allowed or required by policy or law. This confidentiality is critical to the voluntary reporting, conciliation, investigation, and compliance obligations of the University and without it, these processes will be less effective.

11. The University ensures enforcement of some policies through the Office of Equity Compliance and Title IX, which includes use of a Title IX Coordinator as required by federal law. The University needs to be able to rely on its Title IX Coordinator to maintain confidentiality to ensure voluntary compliance with these obligations.

I declare under the penalty of perjury the foregoing is true to the best of my knowledge.

Dated: December 26, 2024

A handwritten signature in black ink, appearing to read "Courtney R. White". The signature is written in a cursive, flowing style.

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Courtney R. White